

**SUPPORTING STATEMENT FOR REQUEST FOR OMB APPROVAL  
UNDER THE PAPERWORK REDUCTION ACT OF 1995**

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## **A. JUSTIFICATION**

This is a justification for the Department of Labor, Employment and Training Administration's (ETA) request for approval to modify the existing program reporting and recordkeeping requirements of the Indian and Native American programs authorized under Public Law 105-220, Workforce Investment Act of 1998 (WIA), section 166 and to extend ETA Form 9080, which grantees use to submit quarterly financial status reports.

Each grantee administering funds under the Indian and Native American programs is required to submit a Comprehensive Services Program (CSP) Report (ETA 9084) and Standardized Participant Record Data (See Attachment A) and a Supplemental Youth Services (SYS) Program Report (ETA Form 9085) (See Attachment B). The modified reporting system will require reports to be submitted on a quarterly basis. Currently, reports are submitted on a semi-annual and annual basis.

Modifying the reporting and recordkeeping system is necessary in order to include data collection necessary for tracking grantee progress against a set of common performance measures beginning July 1, 2006 for the CSP and April 1, 2007 for the SYS.

The accuracy, reliability, and comparability of program reports submitted by grantees expending Federal funds are fundamental elements of good public administration and are necessary for maintaining and demonstrating system integrity. The use of a standard set of data elements, definitions, and specifications at all levels of the workforce system helps improve the quality of performance information that is received by the Department. The common measures are an integral part of ETA's performance accountability system and ETA will continue to collect from grantees the data on program activities, participants, and outcomes that are necessary for program management and to convey full and accurate information on the performance of workforce programs to policymakers and stakeholders.

The extension of ETA Form 9080 (See Attachment C) is of a previously approved information collection request. Section 185 of the WIA requires funds recipients to keep records and submit such reports as may be required by the Secretary of Labor "to permit the tracing of funds to a level of expenditure adequate to ensure that the funds have not been spent unlawfully." The current WIA section 166 program regulations at 20 CFR 667.300 require quarterly financial reports from all "direct grant recipients." The Final Rule at 20 CFR 668.610 mandates an annual and "interim reports on program participants and activities" for the section 166 grantees.

### **A.1 Circumstances Necessitating Data Collection**

In 2001, the President announced a Management Agenda to improve the management and performance of the Federal government. Budget and performance integration, one of the five government-wide goals, emphasizes program effectiveness. As part of the President's Management Agenda, the Office of Management and Budget (OMB) and other Federal agencies

developed a set of common performance measures to be applied to certain Federally-funded employment and training programs with similar strategic goals.

The implementation of common performance measures across Federal job training and employment programs will enhance the government's ability to assess the effectiveness and impact of the workforce investment system, including the performance of the system in serving individuals facing significant barriers to employment. Multiple sets of performance measures have burdened states and grantees as they are required to report performance outcomes based on varying definitions and methodologies. By minimizing the different reporting and performance requirements, common performance measures can facilitate the integration of service delivery and break down barriers to coordination among programs.

The common measures are an integral component of the Indian and Native American programs' performance accountability system. The value of common measures is the ability to describe in a similar manner the core purposes of the workforce system - how many people found jobs; did people stay employed; and did their earnings increase. Standardizing the definitions of the outcomes across programs simplifies reporting and provides a greater ability to compare and manage results. Implementing changes to the reporting requirements to be able to calculate the common measures, beginning in Program Year 2006 for the Indian and Native American programs, will enhance the Agency's ability to manage the programs and assess the overall effectiveness of the workforce investment system.

ETA's statutory and regulatory authority to administer the Indian and Native American programs includes provisions allowing for the requirement of performance reporting from grantees. The WIA includes provisions that require each grantee to furnish to the Secretary such information and reports as are necessary or appropriate for carrying out the purposes of section 166 of the Act.

Information is collected through ETA's Indian and Native American programs' reporting and recordkeeping system under the following authorities (Also see Attachment C):

WIA section 166

(e) Program Plan.— In order to receive a grant or enter into a contract or cooperative agreement under this section an entity described in subsection (c) shall submit to the Secretary a program plan that describes a 2-year strategy for meeting the needs of Indian, Alaska Native, or Native Hawaiian individuals, as appropriate, in the area to be served by such entity. Such plan shall—

- (1) be consistent with the purpose of this section;
- (2) identify the population to be served;
- (3) identify the education and employment needs of the population to be served and the manner in which the activities to be provided will strengthen the ability of the individuals served to obtain or retain unsubsidized employment;
- (4) describe the activities to be provided and the manner in which such activities are to be integrated with other appropriate activities; and
- (5) describe, after the entity submitting the plan consults with the Secretary, the performance measures to be used to assess the performance of entities in carrying out the activities assisted under this section.

(h)(2)(a)— “establishing regulations to carry out this section, including performance measures for entities receiving assistance under such subsection, taking into account the economic circumstances of such entities; and”

WIA Regulations Final Rule 20 CFR Part 652 et al.

**§ 668.600**

- (a) The INA grantee is responsible to the Native American community to be served by INA funds.
- (b) The INA grantee is also responsible to the Department of Labor, which is charged by law with ensuring that all WIA funds are expended:
  - (1) According to applicable laws and regulations;
  - (2) For the benefit of the identified Native American client group; and
  - (3) For the purposes approved in the grantee’s plans and signed grant document.

**§ 668.610**

- (a) Each INA grantee must establish its own internal policies and procedures to ensure accountability to the INA grantee’s governing body, as the representative of the Native American community(ies) served by the INA program. At a minimum, these policies and procedures must provide a system for governing body review and oversight of program plans and measures and standards for program performance.
- (b) Accountability to the Department is accomplished in part through on-site program reviews (monitoring), which strengthen the INA grantee’s capability to deliver effective services and protect the integrity of Federal funds.
- (c) In addition to audit information, as described at §668.850 and program reviews, accountability to the Department is documented and fulfilled by the submission of reports. For the purposes of report submission, a postmark or date indicating receipt by a private express delivery service is acceptable proof of timely submission. These report requirements are as follows:
  - (1) Each INA grantee must submit an annual report on program participants and activities. This report must be received no later than 90 days after the end of the Program Year, and may be combined with the report on program expenditures. The reporting format is developed by ETA, in consultation with the Native American Advisory Council, and published in the **Federal Register** (Attachment D).
  - (2) Each INA grantee must submit an annual report on program expenditures. This report must be received no later than 90 days after the end of the Program Year, and may be combined with the report on program participants and activities.
  - (3) INA grantees are encouraged, but not required, to submit a descriptive narrative with their annual reports describing the barriers to successful plan implementation they

have encountered. This narrative should also discuss program successes and other notable occurrences that effected the INA grantee's overall performance the year.

- (4) Each INA grantee may be required to submit interim reports on program participants and activities and/or program expenditures during the Program Year. Interim reports must be received no later than 45 days after the end of the reporting period.

## **§ 668.620**

Indicators of performance measures and levels of performance in use for INA programs will be those indicators and standards proposed in individual plans and approved by us, in accordance with guidelines we will develop in consultation with INA grantees under WIA section 166 (h) (2) (A).

WIA section 185 broadly addresses reports, recordkeeping and investigations across programs authorized under title I of the Act. The provisions of section 185:

- Require the Secretary to ensure that all elements of the information required for reports be defined and reported uniformly (WIA section 185(d)(2));
- Direct each state and each Local Board and each recipient (other than a sub-recipient, sub-grantee, or contractor of a recipient) to prescribe and maintain comparable management information systems, in accordance with the guidelines that shall be prescribed by the Secretary designed to facilitate the uniform compilation, cross tabulation, and analysis of programmatic, participant and financial data, on statewide, local area, and other appropriate bases, necessary for reporting, monitoring, and evaluating purposes, including data necessary to comply with section 188 (WIA section 185(c)(2));
- Require that recipients of funds under title I of WIA shall maintain records and submit reports containing such information as the Secretary may require "...to permit the tracing of funds to a level of expenditure adequate to ensure that the funds have not been spent unlawfully". The WIA section 166 regulations (20 CFR 667.300) require quarterly financial reports from all "direct grant recipients"; and
- Specify that the reports shall include information about programs and activities carried out under title I of WIA pertaining to:
  - Relevant demographic characteristics (including race, ethnicity, sex, and age) and other related information regarding participants;
  - Programs and activities in which participants are enrolled, and the length of time that participants are engaged in such programs and activities;
  - Outcomes of the programs and activities for participants, including the occupations of participants and placement for participants in nontraditional employment;
  - Specified costs of the programs and activities; and
  - Information necessary to prepare reports to comply with section 188 and 29 CFR Part 37 (section 185(d) (1) (a-e)).

## **A.2 How, by Whom, and For What Purpose the Information is to be Used**

Grantees will be expected to implement revised recordkeeping and reporting requirements with available funds. The implementation of the proposed reporting requirements will organize collected data and standardize the measurement of performance. At a minimum, information collected and reported through the CSP ETA Form 9084, SYS Program ETA Form 9085, and ETA Form 9080 (financial) will be used by grantees and ETA for the following purposes:

1. To provide program and performance, including financial performance, information to stakeholders including participants, businesses, taxpayers, Congress and others;
2. To continuously improve the quality, effectiveness and efficiency of customer services delivered through the Indian and Native American programs;
3. To provide management information for use in Federal program administration and oversight, including grant-specific participation, service, and outcome summaries. Selected demographic information will also be used to demonstrate compliance with all applicable laws and regulations, and to prepare and maintain grantee management reports; and
4. To measure compliance with the Government Performance and Results Act (GPRA) and to assess the program using the Administration's Performance Assessment Rating Tool (PART).

## **A.3 Use of Technology to Reduce Burden**

In order to comply with the Government Paperwork Elimination Act, ETA is streamlining the collection of the Indian and Native American programs' participant data and the preparation of quarterly performance reports by providing a common case management and reporting system, formally called the Native American Workforce Investment Act (NAWIA) System, as well as uniform report formats and data definitions to grantees across ETA programs. All of the Indian and Native American programs' reports will be submitted to ETA via the Internet. Grantees will collect, retain, and report all information electronically through the NAWIA management information system.

All grantees currently submit financial status reports (ETA Form 9080) via the Internet and ETA's Enterprise Business Support System (EBSS).

## **A.4 Efforts to Identify Duplication**

The WIA section 166 program is unique, both by law and regulation. No other data source will supply the information needed to account for and evaluate the section 166 programs.

## **A.5 Methods to Minimize Burden on Small Businesses**

No small businesses entities are impacted.

## **A.6 Consequences of Less Frequent Data Collection**

The WIA is specific about reporting requirements and reporting frequency. The Department would not be in compliance with the statute if it did not comply with these requirements.

The Final Rule at 20 CFR 667.300 which governs the due date states:

**§ 667.300(a) General.** All States and other direct grant recipients must report financial, participant, and performance data in accordance with instructions issued by DOL. Required reports must be submitted no more frequently than quarterly within a time period specified in the reporting instructions.

Collection of this information is absolutely necessary to ensure proper accountability of Federal funds and ensuring that the funds are being spent for the purposes intended by the Congress. This collection of information gives staff the ability to provide timely technical assistance to grantees that are failing below acceptable performance levels. The collection of fewer data elements would seriously hamper the ability of the Department to respond to data requests from Congress and the Administration and compromise the Department's efforts to comply with the GPRA.

## **A.7 Special Circumstances for Data Collection**

The data collection modification involves a special consideration for the collection of unemployment insurance wage data to track common measures. Currently, mechanisms are not in place to provide access to wage records for section 166 grantees. As specified in Training and Employment Guidance Letter No. 17-05, "For these grantees, supplemental sources of data will be permitted as an interim means of reporting on the earnings measure until all grantees in a program have access to wage records." Any adjustments necessary for the implementation of this measure using supplemental information as the data source will be addressed in separate program guidance.

## **A.8 Federal Register Notice and Consultation Outside the Agency**

In accordance with the Paperwork Reduction Act of 1995, the public will be given 60 days to review the Federal Register notice (mmddyyyy, Vol. XX, No. XXX, Pgs. XXXXX – XXXXX). A copy of the Federal Register notice can be found under Attachment D. During the comment period for this OMB clearance request, ETA will make available a dedicated email address to provide technical assistance and to respond to questions and concerns regarding this revised data collection request.

## **A.9 Payment of Gifts to Respondents**

There is no payment of gifts to respondents under this data collection.

## **A.10 Confidentiality Assurances**

ETA and its contractor for the Native American Workforce Investment Act (NAWIA) System is responsible for protecting the confidentiality of the INA participant and performance data and will maintain the data in accordance with all applicable federal laws, with particular emphasis on compliance with the provisions of the Privacy and Freedom of Information Acts. The Department works diligently to ensure the highest level of security whenever personally identifiable information is stored or transmitted. All contractors that have access to individually identifying information are required to provide assurances that they will respect and protect the confidentiality of the data. ETA's Performance and Technology Office (PROTECH) has been an active participant in the development and approval of data security measures – especially as they apply to the agency's on-line grantee reporting system (EBSS) that will collect personally identifiable data on a quarterly basis.

A key concern is for the protection of participant social security numbers (SSNs), which is voluntarily provided by the individual as part of this information collection request. The SSN is being requested in order to validate common measures and to match program participant records with state/federal wage record databases. The NAWIA System will also include a statement that informs the individual where the information he/she has provided is being stored, the name and location of the system, and that the information is protected in accordance with the Privacy Act. When participant files are retrieved within the NAWIA System, only the last four digits of the social security number will be displayed. Any information that is shared or made public is aggregated by the grantee or ETA and does not reveal personal information on specific individuals.

## **A.11 Additional Justification for Sensitive Questions**

While sensitive questions will be asked of participants in the proposed data collection, for the purpose of collecting demographic data, the confidentiality of participants will be protected as discussed in section A.10. In addition, security mechanisms will be built into the NAWIA data collection system by the ETA contractor as well as the agency's on-line grantee reporting system. Participant responses to these sensitive questions will allow ETA to comprehensively evaluate the effectiveness of the INA program.

## **A.12 Estimates of the Burden of Data Collection**

The annual national burden for the INA reporting system has four components: (1) the quarterly Comprehensive Services Program reporting burden (ETA Form 9084); (2) the Standardized Participant Information Record (SPIR) data collection burden; (3) the quarterly Supplemental Youth Services Program reporting burden (ETA Form 9085); and (4) the quarterly Financial Status Report (ETA Form 9080). This response provides a separate burden estimate, based on a quarterly basis, for each of these components. Approximately 142 grantees will respond to the Comprehensive Services Program and SPIR data collection components, and approximately 98 grantees will respond to the Supplemental Youth Services Program data collection component.

Approximately 284 grantees will respond to the Financial Status Report data collection component. Labor-funded grantees participating in the demonstration project under Public Law 102-477 will not be affected by this information collection request and have not been included in the following burden estimates.

(1). Quarterly Comprehensive Services Program Report Burden

The INA *quarterly report burden for ETA Form 9084* assumes that all grantees will use the ETA-provided NAWIA System to generate ETA Form 9084. The NAWIA System is designed to apply edit checks to participant data and to generate facsimiles of the aggregate information on enrollee characteristics, services provided, and supplemental outcomes data in quarterly report format. The burden includes reviewing and correcting errors identified by the grantee in the participant-level data and generating, reviewing, and approving the aggregate quarterly reports. It is assumed that each grantee will spend approximately twenty-four (24) hours per quarter preparing this report.

Report	Hrs. Per Year Per Grantee	Number of Grantees	Annual National Hours	Applicable Hourly Rate	Annual National Burden Dollars
ETA Form 9084	96	142	13,632	\$23.13	\$315,308

(2). SPIR Data Collection Burden

The INA *SPIR data collection burden* considers the amount of participant and performance-related information collected and reported on the participant record that would not have to be collected by the grantees as part of their customary and usual burden to run the program. Thus the burden reflects the information collected solely to comply with the federal reporting requirements. The data collection burden includes program run times to extract program participant data, formatting, data editing and checking, and transmitting the files to the Department. The participant data collection estimate also does not include the burden associated with collecting and reporting information required to meet EEO requirements, which is covered under a separate burden estimate. It is assumed that each grantee will spend approximately 2.5 hours per record preparing this report each quarter.

Record Type	Hrs. Per Record	PY 03 Actual National Participant Count	Annual National Burden Hours	Applicable Hourly Rate	Annual National Burden Dollars
SPIR Data	2.5	18,277	45,693	\$23.13	\$1,056,868

(3). Quarterly Supplemental Youth Services Program Report Burden

The INA *quarterly report burden for ETA Form 9085* assumes that all grantees will use the ETA-provided NAWIA System to generate ETA Form 9085. The NAWIA System is designed to apply edit checks to participant data and to generate facsimiles of the aggregate information on enrollee characteristics, services provided, and outcomes data in quarterly report format. The burden includes reviewing and correcting errors identified by the grantee in the participant-level data and generating, reviewing, and approving the aggregate quarterly reports. It is assumed that each grantee will spend approximately twenty-four (24) hours per quarter preparing this report.

Report	Hrs. Per Year Per Grantee	Number of Grantees	Annual National Hours	Applicable Hourly Rate	Annual National Burden Dollars
ETA Form 9085	96	98	9,408	\$23.13	\$217,607

(3). Quarterly Financial Status Report Burden

The INA *quarterly report burden for ETA Form 9080* assumes that all grantees will use ETA's EBSS. The burden includes reviewing and correcting errors identified by the grantee in generating, reviewing, and approving the aggregate quarterly reports. It is assumed that each grantee will spend approximately 9.67 hours per quarter preparing this report.

Report	Hrs. Per Year Per Grantee	Number of Grantees	Annual National Hours	Applicable Hourly Rate	Annual National Burden Dollars
ETA Form 9080	38.68	CSP - 142 SYS - 98	9,284	\$23.13	\$214,739

All hourly rates used to calculate cost are the average hourly earnings in the Bureau of Labor Statistics's management analyst occupational category within state and local government (July 2004, National Compensation Survey, U.S. Bureau of Labor Statistics, Supplementary Table 3.1).

Estimated Total Burden Hours (section 166): 83,510

Required Section 166 Activity/Report	Number of Respondents	Responses Per Year	Total Responses	Average Hours Per Response	Annual Burden Hours
ETA Form 9084 (CS)	142	4	568	24	13,632
SPIR Data	142	4	18,277	2.5	45,693
ETA Form 9085 (SYS)	98	4	392	24	9,408
ETA Form 9080- CSP	142	4	568	9.67	5,493
ETA Form 9080- SYS	98	4	392	9.67	9,284
<b>TOTALS</b>	<b>240</b>	<b>20</b>	<b>20,197</b>	<b>348</b>	<b>83,510</b>

### **A.13 Estimated Cost to Respondents**

#### **a) Start-up/capital costs: \$0**

There are no start-up costs, as ETA will provide grantees with a NAWIA data collection and reporting system that grantees will use to collect and maintain participant data, apply edit checks to validate the data, and generate all quarterly reports for electronic submission to the Department. Also, grantees will submit Financial Status Reports via the Internet and EBSS.

#### **b) Annual costs: \$0**

There are no annual costs, as ETA will be responsible for the annual maintenance costs for the NAWIA data collection and reporting system and EBSS. All costs to maintain and disclose these data are covered by the existing WIA section 166 grant funds.

### **A.14 Estimates of Annualized Costs to Federal Government**

The start-up cost for modifying the NAWIA software to collect, maintain, and extract the Standardized Participant Information Record, and generate all aggregate statistical data necessary to produce the ETA 9084, 9085, and 9080 forms, electronically, is estimated to be \$87,591. The annual costs of maintaining the NAWIA system and developing training and technical assistance guides, estimated to be \$20,000, are also borne by ETA.

ETA will continue to collect and maintain all quarterly reports through its Office of Performance and Technology's on-line Enterprise Business Support System (EBSS). Since the electronic mechanisms for collecting and storing grantee performance data on a quarterly basis are already in place to support other ETA programs, the annualized cost to the Federal government to incorporate the INA reports will be minimal. The annual costs of maintaining the INA quarterly reports and records through EBSS, matching SPIR data with state UI wage records and other Federal employment databases, and generating quarterly performance reports for each grantee based on the common measures is estimated to be \$115,000.

For the quarterly performance reports (ETA Forms 9084, 9085, and 9080), it is estimated that staff spend approximately 40 hours per quarter (320 hours per year) monitoring the data, providing technical assistance for grantee report submissions, preparing special aggregate reports for internal program management purposes, and generating specific responses to Congressional and other inquiries. Using an average hourly staff rate of \$35.83, the estimated annual cost to the Federal government is \$11,466.

The total estimated annual cost to the Federal government for this data collection is \$234,057. The hourly rate used to calculate cost is the average hourly rate for a GS-13 (Step 1) employee in the Federal service (based on 2005 GS locality pay schedules [http://www.opm.gov/oca/05tables/.](http://www.opm.gov/oca/05tables/))

### **A.15 Changes in Burden**

The modification of the NAWIA System to collect information pertinent to tracking common measures outcomes will require grantees to submit quarterly reports. This requirement increases the current workload grantees have with semi-annual reporting. In addition to an increase in reporting, grantees will also be required to obtain supplemental data currently not obtained under the current performance measurement system.

### **A.16 Tabulation of Publication Plans and Time Schedules for the Project**

Grantees will submit all performance reports on a quarterly basis to ETA within 45 days of the end of each quarter. Quarterly report data will be analyzed by ETA staff and used to evaluate performance outcomes and program effectiveness.

Each year, ETA issues an annual report summarizing program performance based on the Secretary's goals. Data contained in the INA reports will be included in these reports. The data will also be used to prepare GPRA reports, management and budget reports, and other ad hoc reports. All aggregate reports will be made available on the Internet and accessible to the public.

<b>Product</b>	<b>Submission Date</b>	<b>Comments</b>
<b>ETA Form 9084: CS Program Report</b>	Within 45 days after the end of the quarter.	Quarterly program reports (ETA Forms 9084, 9085, and 9080) and SPIR data will be submitted electronically using ETA's On-Line Enterprise Business Support System (EBSS).
<b>SPIR Data</b>	Within 45 days after the end of the quarter.	
<b>ETA Form 9085: SYS Program Report</b>	Within 45 days after the end of the quarter.	
<b>ETA Form 9080: Financial Status Report (CSP and SYS)</b>	Within 45 days after the end of the quarter.	

#### **A.17 Approval Not to Display OMB Expiration Date**

The expiration date for OMB approval will be displayed. We are not seeking approval to have this concealed. Once OMB approval is received, ETA will issue guidance that will formally transmit the reporting package to grantees that includes the following statement: "It is estimated that, on average, the time needed to complete the INA program reporting requirements will be 96 hours annually per respondent for the Comprehensive Services Program Report (ETA Form 9084), 257 hours annually per respondent for the SPIR data collection, 96 hours annually per respondent for the Supplemental Youth Services Program Report (ETA Form 9085), and 77.36 hours for the Financial Status Report (ETA Form 9080) for the CSP and SYS, as detailed in the table below. You may submit any comments regarding these reporting documents to: Ms. Athena R. Brown, Indian and Native American programs, U.S. Department of Labor, Employment and Training Administration, 200 Constitution Avenue, NW, C-4311, Washington, D.C. 20210 ([brown.athena@dol.gov](mailto:brown.athena@dol.gov)). Please include Paperwork Reduction Act 1205-0422 with your correspondence."

<b>Form/Activity</b>	<b>Total Annual Burden/Hours</b>	<b>Total Respondents</b>	<b>Average Annual Hours/Respondent</b>
ETA Form 9084	13,632	142	96
SPIR Data Collection	45,693	142	257
ETA Form 9085	9,408	98	96
ETA Form 9080- CSP	5,493	142	38.68
ETA Form 9080- SYS	3,791	98	38.68
<b>Total</b>	<b>83,510</b>	<b>240</b>	<b>348</b>

**A.18 Exceptions to OMB Form 83-I**

No exceptions are requested in the “Certification of Paperwork Reduction Act Submissions.”

<p><b>B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS</b></p>
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This data collection does not employ any statistical methods.

## **ATTACHMENTS**

Attachment A – General Reporting Instructions for the Comprehensive Services Program Report (ETA Form 9084) and Standardized Participant Information Record Data

Attachment B – General Reporting Instructions for the Supplemental Youth Services Program Report (ETA Form 9085)

Attachment C – General Reporting Instructions for the Financial Status Report (ETA Form 9080)

Attachment D - Relevant Statutory/Regulatory Citations

Attachment E – Federal Register Notice